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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION I

DATE: April 12, 1985

FROM: Andy Hoffman, Chemical Engineer
CT/RI Waste Programs Section

TO: George Dews, Senior Sanitary Engineer
Hazardous Waste Management Section, CT DEP

SUBJ: Part B Application
Pratt & Whitney Aircraft Group
400 Main Street
East Hartford, Connecticut 06106
EPA I.D. No. CTD 990672081

The following are my comments on Pratt and Whitney's March 22, 1985 Part B submittal.

Section M - Storage of Containers - (40 CFR 270.15 and 264 Subpart I)

Page 126 states that aisle space is not needed because of the openness of the area and the nonflammability of the wastes. However, aisle space is also necessary so that all drums can be inspected. Verify that all drums can be fully inspected in this section.

Section O and Appendix 3 - Liquid Injection Incinerator - (40 CFR 270.19 and 264 Subpart O)

1.) Page 7 in Appendix 3 states that the scrubber water flow rate is 98 GPM. However, table IV on page 25 states it to be 38 GPM. Which is the correct value?

2.) Verify that the sample waste streams in table III have the proper chlorine concentration as specified in table II.

CONCURRENCES								
SYMBOL	HSC							
SURNAME	HOFFMAN							
DATE	4-12-85							

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*U.S. GPO : 1984-436-836

3.) The expected flue gas temperature and volumes in Table III are not entirely within the test range as specified in table IV.

4.) Please clarify where the liquid entrainment from the demister system drains to.

5.) Prepare a temperature range to be tested during the trail burn which corresponds to the expected operating temperature range.

6.) The auxiliary gas flow rate and combustion zone temperatures should be monitored throughout the trial burn.

7.) Prepare procedures for testing the emergency shut down and waste feed cutoff equipment.

8.) Describe the calibration steps for the temperature, pressure, flow rate, combustion gas velocity and CO monitoring equipment.

9.) Please provide a date and schedule for conducting the trial burn.

cc: Dick Boynton